

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

December 3, 2020

Via ECF

The Honorable George B. Daniels
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street
 New York, New York 10007

RE: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Daniels:

The Plaintiffs' Executive Committees for Personal Injury and Death Claims and for Commercial Claims ("PECs") write to request an extension of time by which to file replies in support of their Fed.R.Civ.P. 72 objections to the September 30, 2020 decision regarding the establishment of a common benefit fund docketed at ECF No. 6481. Currently, the replies in support of objections (docketed at ECF Nos. 6520, 6522 and 6524) are due on December 9, 2020. Because of filing deadlines, court appearances and other competing demands on the time of the attorneys for the PECs responsible for submitting the reply memoranda, including several matters relating directly to this MDL, they respectfully ask this Court to extend the date by which the replies in support of those objections noted above must be filed by one week, until December 16, 2020.

Opposing counsel has told us that they do not object to this request and this is the first request for an extension of time by which to file the replies. For all of the reasons stated above, the PECs respectfully request that this Court extend the time by which both PECs must file replies in support of their objections to ECF No. 6481 (that is, replies in support of objections docketed at ECF Nos. 6520, 6522 and 6524) until December 16, 2020.

December 3, 2020
Page 2

Respectfully submitted,

KREINDLER & KREINDLER, LLP

MOTLEY RICE LLC

By: /s/ Megan W. Bennett

Megan W. Bennett
James P. Kreindler
Andrew J. Maloney
Kreindler & Kreindler, LLP
750 Third Avenue
New York, NY 10017
Tel: 212-687-8181
E-mail: spounian@kreindler.com

*On behalf of the MDL 1570 Plaintiffs' Exec.
Committee for Personal Injury and Death
Claims*

By: /s/ Robert T. Haefele

Robert T. Haefele
Motley Rice LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
Tel: (843) 216-9184
E-mail: rhaefele@motleyrice.com

*On behalf of the MDL 1570 Plaintiffs' Exec.
Committee for Personal Injury and Death
Claims*

COZEN O'CONNOR

By: /s/ Sean P. Carter

Sean P. Carter
J. Scott Tarbutton
Cozen O'Connor
One Liberty Place
1650 Market Street, Suite 2800
Philadelphia, PA 19103
Tel: (215) 665-2105
E-mail: scarter@cozen.com

*On behalf of the MDL 1570 Plaintiffs' Exec.
Committee for Commercial Claims*

cc: All Counsel of Record via ECF